Appendix N: Public Comment 10

Comment Number: FNS-2022-0015-1337-0027

All Sections: 3.3.2.3.3, 5.2.10.1.2, 3.3.2.2.3

Classification: Substantive

Commenter Type: Advocacy groups/NGO

Organization: National WIC Association

Excerpt Text: NWA applauds the intent of strengthening state agency staffing standards to support the WIC Food Delivery Coordinator and WIC Customer Service Coordinator positions. NWA agrees that state agency responsibilities have shifted to encompass greater expertise in managing technologies related to food delivery and participant-facing activities. Few state WIC agencies are currently positioned to either designate current staff or quickly hire new staff to serve in these roles. Without additional funding, NWA is not confident that state WIC agencies would be able to satisfy this regulatory requirement. NWA urges USDA to increase Nutrition Services & Administration funding to account for these new staffing positions.